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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TONEY A. WHITE, III,

Plaintiff,

v.

CHARLIE DANIELS, *et. al.*,

Defendant.

CASE NO.: 2:21-cv-01259-RFB-VCF

**STIPULATION AND ORDER EXTENDING
RESPONSE DEADLINE TO
DEFENDANT'S MOTION TO DISMISS
[EFC NO. 254]**

(FIRST REQUEST)

Plaintiff, Toney A. White, III ("White"), by and through his pro bono counsel of record, Eric R Olsen of Garman Turner Gordon LLP, and Defendants, Gregory Bryan, Ryan Clay, Bob Faulkner, Rio Manalang, Michael Minev, Theresa Wichham and Robin Hager (collectively "Defendants"), by and through their counsel of record Chris Davis, Senior Deputy Attorney General, Office of the Attorney General, hereby stipulate and request that Plaintiff White have an extension of time to respond to Defendant's Motion to Dismiss ("Motion") [ECF No. 245]. This is the first request to extend time to respond to the Motion. Plaintiff was served with the Motion on December 5, 2023, the current deadline to respond is December 19, 2023, and the Parties stipulate to and request a 15-day extension, up to and including January 3, 2024.

In support of this Stipulation, the Parties state as follows:

1. Counsel for the Parties met and conferred on December 18, 2023, and agreed to extend the date by which Plaintiff must respond to Defendants' Motion to Dismiss until on or before January 3, 2024.

2. In return for Defendant's agreement to extend the time to respond to Defendants' Motion to Dismiss, Plaintiff agreed not to use this extension against Defendant for any purpose.

3. Good cause exists to extend the time by which Plaintiff is required to respond to Defendant's Motion to Dismiss because Plaintiff's counsel requires additional time to examine the facts and circumstances of the case before preparing and filing their response memorandum.

Accordingly, the Parties hereto stipulate that the date by which Plaintiff shall file their Response to Defendant's Motion to Dismiss is extended to January 3, 2024.

Dated this 19th day of December 2023.

Dated this 19th day of December 2023.

GARMAN TURNER GORDON LLP

**OFFICE OF THE ATTORNEY
GENERAL**

/s/ Eric R. Olsen

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*Attorneys for Defendants Gregory Bryan,
Ryan Clay, Bob Faulkner, Robin Hager, Rio
Manalang, Michael Minev, and Theresa
Wichham*

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT JUDGE

Dated: December 22, 2023.

Respectfully submitted:

GARMAN TURNER GORDON LLP

/s/ Eric R. Olsen

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